

LOCAL BANKRUPTCY FORM 9013-4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Coleen Burns

Debtor(s)

**JACK N ZAHAROPOULOS
CHAPTER13 TRUSTEE
Coleen Burns**

**Chapter 13
Trustee
Plaintiff(s)/
Movants**

vs.

Luzerne County Tax Claim

**Defendant(s)/
Respondent(s)**

CHAPTER 13

CASE NO. 5:19-BK-04098

ADV. NO. - -ap-

**NATURE OF
PROCEEDING: Motion To Approve
Sale -16 22 E Union
Street, WB**

**DOCUMENT
Nos.
216, 228**

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Debtor's counsel has a scheduling conflict. Also a Stipulation to resolve the Tax Claim objections was filed and is pending Doc No. 229

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: August 11, 2023

Kevin M Walsh, Esquire
Applicant's Signature

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.

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	:	CASE NO. 5:19-bk-04098
Debtor	:	

**CERTIFICATE OF SERVICE
REQUEST TO CONTINUE HEARING
(363(b) – 16-22 E. Union Street, Wilkes-Barre)**

I, Kevin M. Walsh, Esquire, certify that a true and correct copy of the Request To Continue

Hearing on 8-15-2023 has been served on the 11th day of August, 2023 upon the following:

**Jack Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036**

- **By Clerk's Notice of Electronic Filing

By email droeder@pamd13trustee.com**

**David Harris, Esquire
Counsel for Objector:
Luzerne County Tax Claim Bureau**

**By Clerk's Notice of Electronic Filing
By email dh@lawofficeofdavidharris.com**

Coleen Burns

- **By e-mail**

/s/Kevin M. Walsh, Esquire
Attorney for Debtor/Movant
297-299 Pierce Street
Kingston, PA 18704
(570) 283-3041